

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 11 CR 50055
v.)	
)	Judge Frederick J. Kapala
JASON SMIEKEL)	

**DEFENDANT'S MOTION FOR
EARLY TERMINATION OF SUPERVISED RELEASE**

Defendant, JASON SMIEKEL, by and through his attorney, Ralph E. Meczyk, with no objection from Defendant's Probation Officer, respectfully moves this Court for entry of an order granting the early termination of Defendant's supervised release. In support of this motion, Defendant states as follows:

1. Smiekel was charged by indictment on Aug. 16, 2011, with federal murder-for-hire charges.

2. On April 12,. 2012, Defendant pled guilty. In his plea agreement, Smiekel admitted that in late July 2011, he asked an individual if that individual knew someone who would commit a murder-for-hire. The individual provided Smiekel with the first name and cellular telephone number for an ATF Special Agent acting in an undercover capacity. On Aug. 1, 2011, Smiekel offered to pay the undercover agent \$20,000 to kill a certain person. The next day, Smiekel used his cell phone, a facility of interstate commerce, to arrange

for a meeting with the undercover agent, where Smiekel gave \$1,500 in expense money and a photograph of the intended victim to the undercover agent. On Aug. 4, 2011, after Smiekel paid \$7,000 more to the undercover agent as a partial payment for the murder, ATF agents arrested Smiekel at a restaurant in Elgin, Ill. R. 69.

3. On or about December 4, 2012, this Court sentenced Defendant to 102 months' imprisonment and three years' supervised release.

4. Defendant served his term of imprisonment and was released to supervised release in approximately December 2018.

3. Defendant is supervised by United States Probation Officer Brittany Quintanar. Defendant has now completed more than 1 year of his term of supervised release. Officer Quintanar has no objection to the early termination of Defendant's supervised release

3. This Court has discretionary authority to modify or terminate a defendant's period of supervised release, pursuant to 18 U.S.C. § 3583(e)(1). That statute provides that a Court may "terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release . . . if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." 18 U.S.C. § 3583(e)(1).

4. Defendant has completed all of the conditions of his supervised

release so far, including paying off all of the money owed in connection with his conviction. R. 98.

5. Defendant has been a model citizen since his release from prison. Since his release from prison, he has been steadily employed as a contractor at Chicago Service Source since his release.

6. Defendant has derived all of the benefits from and fulfilled all of the purposes of supervised release. It is respectfully suggested that it is no longer necessary to expend the valuable resources of the probation office to monitor him.

WHEREFORE, for the reasons stated above, Defendant respectfully requests that this Court grant his Motion for Early Termination of Supervised Release.

Respectfully submitted,

/s/ Ralph E. Meczyk

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CERTIFICATE OF SERVICE

Ralph E. Meczyk, Attorney at Law, hereby certifies that the foregoing Motion was served on January 9, 2020, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

Respectfully submitted,

/s/ Ralph E. Meczyk

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